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and Hallinan Capital Corp.*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

GMN

Case No. 2:17-cv-02966-~~KID~~-NJK

THOMAS W. MCNAMARA, as the Court-
Appointed Monitor for AMG Capital
Management, LLC; BA Services LLC; Black
Creek Capital Corporation; Broadmoor Capital
Partners, LLC; Park 269, LLC; C5 Capital
LLC; DF Services Corp.; DFTW Consolidated
[UC] LLC; Impact BP LLC; Level 5 Apparel
LLC; Level 5 Capital Partners LLC; Level 5
Eyewear LLC; Level 5 Motorsports, LLC;
Level 5 Scientific LLC; NM Service Corp.
(f/k/a/ National Money Service); PSB Services
LLC; Real Estate Capital LLC (f/k/a/ Rehab
Capital I, LLC); Sentient Technologies; ST
Capital LLC; Westfund LLC; Eclipse
Renewables Holdings LLC; Scott Tucker
Declaration of Trust, dated February 20, 2015;
West Race Cars, LLC; and Level 5
Management LLC; and their successors,
assigns, affiliates, and subsidiaries,

Plaintiff,

v.

CHARLES M. HALLINAN, an individual;

**DEFENDANTS' UNOPPOSED
MOTION TO CONTINUE DEADLINE
TO RESPOND TO MONITOR'S
MOTION TO COMPEL DISCOVERY
FROM DEFENDANT HALLINAN
CAPITAL CORP. (ECF NO. 68)**

(FIRST REQUEST)

HALLINAN CAPITAL CORP., a Delaware
corporation; DOES I-X; and ROE
CORPORATIONS I-X,

Defendants.

Defendants Charles M. Hallinan and Hallinan Capital Corp. ("Defendants") hereby request a brief extension, until February 1, 2018, to file their Response to Plaintiff Court-Appointed Monitor Thomas W. McNamara's ("Plaintiff") Motion Compel Discovery from Defendant Hallinan Capital Corp. (ECF No. 68). Currently, Defendants' Response is due January 28, 2019.

Defendants' counsel has the current conflicts, among others, that necessitate a brief extension of the Response deadline: (1) Defendants' lead counsel has a deadline in another matter which requires counsel's immediate attention on January 25, 2019; (2) Due to childcare obligations on January 26-27, 2019; (3) Defendants' lead counsel is precluded from working on Defendants' Response during this time; (4) On January 30, 2019, counsel for Plaintiff and Defendants will both be attending the scheduled deposition of Linda Hallinan and Defendants' lead counsel will be unable to work on Defendants' Response; (5) Defendants' lead counsel is scheduled to be in Baltimore, MD for an appellate oral hearing before the Circuit Court for Montgomery County, Maryland, on Thursday January 31, 2019, and New York, NY for a motion hearing before the Supreme Court of New York, Bronx County, on February 1, 2019. Defendants' lead counsel's preparation for the aforementioned hearings is required in the preceding days.

In anticipation of filing this Motion, Defendants' counsel reached out to Plaintiff's counsel. Plaintiff's counsel confirmed that Plaintiff does not oppose an extension until Wednesday, January 30, 2019, and takes no position with respect to moving the deadline to February 1, 2019.

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1 Based upon the foregoing stated conflicts with Defendants' lead counsel's schedule and no
2 open objection by Plaintiff, Defendants submit that good cause exists to move the Response
3 deadline to February 1, 2019.

4 DATED this 25th day of January, 2019.

5 SEMENZA KIRCHER RICKARD

6
7 /s/ Jarrod L. Rickard

8 Lawrence J. Semenza, III, Esq., Bar No. 7174

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12 Las Vegas, Nevada 89145

13 *Attorneys for Defendants,*

14 *Charles M. Hallinan and Hallinan Capital Corp.*

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17 IT IS SO ORDERED.

18 Dated: January 28, 2019

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Nancy J. Koppe

22 United States Magistrate Judge
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